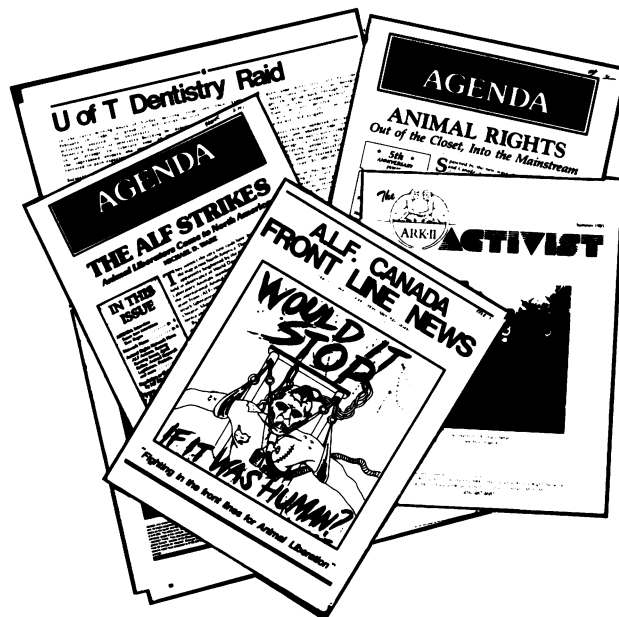


## How animal rights activists threaten the veterinary profession

Ann McWilliams



*"Domestic animals do not really belong on this earth. I would much prefer to see a dogless world or a catless world or a cowless or pigless world... It can be done quite simply by stopping the breeding programs."*

— PAUL WATSON, co-founder of Greenpeace, founder of the Sea Shepherd Conservation Society, and a co-ordinator for Fund for Animals.

*"Animal liberationists do not separate out the human animal, so there is no rational basis for saying that a human being has special rights. A rat is pig is a dog is a boy."*

— INGRID NEWKIRK, Director, Co-founder, People for the Ethical Treatment of Animals (PETA).

*"Anyone who does this (slashing tires and freeing lab animals) is doing God's work."*

— ESTHER KLEIN, former president of the Animal Defence League of Canada.

*"We're definitely winning. Our ranks are growing and it's going to be very difficult, if not impossible, to stop that growth."*

— ALEX PACHECO, Co-founder and Chairman of People for the Ethical Treatment of Animals.

*"As an abolitionist, I do not want to see animals used in research... I would be very pleased to see research laboratories in financial difficulties."*

— VICKI MILLER, founder of ARK II, and former president of the Toronto Humane Society.

Inside Rideau Hall, home to Canada's Governor General, a group of luminaries gathers to receive their country's highest honor — the Order of Canada. Outside, in the chill November rain, a group of 20 chanting demonstrators scan the occupants of each limo as it arrives, searching for the object of their protests. Their placards read "DR. ROWSELL NO FRIEND TO ANIMALS", "DR. ROWSELL DISCREDITS THE ORDER OF CANADA" and "BOOBY PRIZE FOR HARRY."

Their target is not a recalcitrant politician or a leader of unpopular causes, but a recently-retired professor of pathology from the University of Ottawa's Faculty of Medicine, veterinary pathologist, Dr. Harry Rowsell. Rowsell was being honored for his internationally-recognized work with the Canadian Council on Animal Care (CCAC), the advisory body which he was largely responsible for founding in 1968. Its guidelines must be followed by all those conducting animal-based research in Canada; otherwise, they face withdrawal of major funding (1).



### "Kentucky Fried Five"

In Toronto, the self-dubbed "Kentucky Fried Five," members of the militant Animal Liberation Front (ALF) charged in connection with vandalization of a fried chicken outlet and the Faculty of Dentistry of the University of Toronto, November 23, 1988, pleaded guilty to charges ranging from possession of burglary tools, to mischief and wilful damage. However, defended by Canada's best-known lawyer, Clayton Ruby, on December 22 they were given one year's probation, suspended sentences and community service, even though, when they were arrested, police found burglary tools and gun powder (2).

During the trial, Judge E. Wren had permitted the group to show *The Animal Farm*, a 1981 film castigating intensive livestock management practices (3). In his summation, Judge Wren stated that "the accused were undoubtedly motivated, not by the ordinary crass and selfish or personal motives accompanying the commission of the ordinary criminal offence. They were clearly motivated by humane and moral considerations." He also noted the accused' "intelligence and considerable education" (The majority of Animal Rights activists are white, fairly young, well-educated women) (4).

"As far as I'm concerned, giving the ALF such a light sentence means that the judge was condoning violence. He even made the comment that their intentions were good. And the suggestion that they serve their community service time at the Toronto Humane Society is a joke," says Dr. Jim Kenyon, director of veterinary services for Toronto Hospital/Department of Anesthesia, University of Toronto.

Kenyon is one of a growing number of individuals working with animals who have cause for concern. In 1985, his car's tires were slashed and his wife's life was endangered when his brakes were tampered with. In 1987, the transmission was tampered with, and a friend and her nine year-old daughter narrowly escaped serious injury.

In the US, Dr. J. Dubey, a Beltsville researcher who had 36 cats involved in a toxoplasmosis study stolen by the Band of Mercy, is angry: "As a veterinarian I've done more for animal welfare than an animal activist does in his whole life," he says, adding "We will not be intimidated" (5,6).

### "Who butters your bread?"

An article in North America's most prominent animal rights magazine, *Animals' Agenda* (September, 1985), in a thinly-veiled threat, after claiming that American pet owners paid their veterinarians \$3.8 billion in 1982-83, told "animal lovers" to "remind your local veterinarians who butters their bread" (7).

A *Globe and Mail* article (July 6, 1987) put American pet care at \$13.5 billion in 1983, and by extrapolation, Canadian pet care at an estimated \$1 billion according to Jim Badow, former executive director of the Canadian Federation of Humane Societies (CFHS). "Pets are big business," says Dr. J.H. Millington, of the obvious (8).

"Since Canadians spent far more on pet food in the last 12 months than they donated to Ethiopian famine relief, it should be no surprise that animal rights

organizations have been able to mushroom and capture headlines," Charlotte Gray wrote in the *Canadian Medical Association Journal* (9).

## Association of Veterinarians for Animal Rights

As with doctors, nurses, lawyers and psychologists, there is an Association of Veterinarians for Animal Rights (AVAR). It was founded in the US, in 1981, by veterinarian Dr. Neil Wolff, a graduate of Areneta University in the Philippines, and Dr. Nedim Buyukmihci, a professor of veterinary medicine at the University of California, Davis.

Wolff has set up a clinic in Greenwich, Connecticut which does not offer "mutilations" such as ear cropping and tail docking. The hospital also informs the public about proper companion animal care, offers AR literature, and even sells vegetarian dog food (10).

In 1985, Buyukmihci called upon people wishing to fight for animal rights to become veterinarians, stating: "We need people who will fight against the present system of organized veterinary medicine, much too often in partnership with the farm animal and trapping industries" (11).

However, in 1987, Buyukmihci was quoted as saying that he had "witnessed a tremendous (negative) over-reaction to animal rights ideas" within veterinary academia (12). He probably is even more certain of it now; he was recently removed as leader of a required veterinary ophthalmology course after he sought to use only terminally-ill animals in presenting it (The animals being used were unwanted strays, and all studies were acute, nonsurvival). He was also told not to use university letterhead for his AR correspondence. Buyukmihci has since launched a lawsuit against the university, charging violation of his right to freedom of speech (13).

Canadian veterinarians approached could not understand how their American colleagues could support an organization such as AVAR, which, if successful could virtually obviate the need for the profession.

Animal rights activists are opposed to all animal use: in the laboratory, as pets, as food, clothing, or entertainment, e.g. in rodeos or zoos. Animal rights activists have had notable success in stopping Canada's seal hunt (14), and although fur sales are reportedly booming (15), the fur industry is warned that fake furs are becoming chic (16).

It was only recently that some light was shed on the matter by Dr. R.A. Stuhlman. In a letter in the *Journal of the American Veterinary Medical Association* (October, 1988), he wrote "I believe it is misleading to name an organization "Association of Veterinarians for Animal Rights" when its membership comprises 273 nonveterinarians and only 127 veterinarians" (17).

According to veterinarian Dr. Frank Flowers, director of assessments for the Canadian Council on Animal Care (CCAC), "by far the majority of this country's institutions using animals have contractual arrangements for veterinary services; all but two small labs have a veterinarian named to their institutional Animal Care Committees."

As a general rule, ACC approval of research protocols (on ethical grounds) must be obtained before animals can even be ordered, and these committees can stop a project if an animal is suffering unrelievable pain. Most ACCs include at least one community representative. However, April 3, Dr. Peggy Johnson-Lussenburg, Chairman of the University of Ottawa ACC, on a live CJOH-TV program, invited abolitionist Esther Klein (former president of the Animal Defence League) to become a member of her committee. "I have better things to do with my time," Klein snapped.

## Activists infiltrate labs

One of the animal rights movement's primary goals is to either raid laboratories or infiltrate them (often taking jobs such as janitor or lab assistant), in order to steal material or take film of less-than-ideal conditions (18). Even primatologist Jane Goodall advocated infiltration (19). These stolen materials are later used to charge those responsible with cruelty or failure to provide appropriate veterinary care, or an even wider goal — to gain publicity and support for the position that all research involving animals is inhumane, frivolous, repetitious, and should be banned.

At the Children's Hospital of Los Angeles, hospital officials agreed with infiltrators that two researchers were not abiding by their protocol, and suspended the scientists (18).

A US organization called People for the Ethical Treatment of Animals (PETA) was founded in 1981 by student Alex Pacheco, who "volunteered" to assist in the neuroscience laboratory of Dr. Edward Taub, at Silver Spring, Maryland. Pacheco found unsanitary conditions and debatable animal care. Now PETA's co-Chairperson, he claims its membership has grown from 8,000 in 1983, to 250,000 (20).

Animal rights has become big business, and a very popular topic. For example, within the last year, cover stories or prominent feature articles have appeared in *Newsweek*, *Chatelaine*, *the United Church Observer*, *Harper's Magazine*, *Parade Magazine*, *Agscene*, and *Town & Country*, as well as many newspapers, and journals such as *Science* and *The Scientist*.

Animal activist Leslie Fain, a laboratory technician, worked undercover as an animal care trainee at Gillette's Maryland testing labs for 18 months, gathering evidence of the company's use of testing methods many consider inhumane. Although she was trained for the role (given a fake background, history, phoney phone numbers, etc.) by PETA, on September 25, 1986, Fain took her evidence to a Canadian group comprising Toronto's ARK II, Montreal's Canadian SPCA, and the Toronto Humane Society (21-23). Press conferences were held in Toronto and Washington. Calls went out to boycott Gillette products (which are many) and stores stocking them were picketed. The Association of Veterinarians for Animal Rights stated flatly that it supports no testing that involves either whole animals, or tissues thereof.

Perhaps the most famous case thus far involved a 30-minute videotape, dubbed *Unnecessary Fuss*, edited from 60 hours of tape stolen in 1984 by the radical Animal Liberation Front (ALF) from the University

of Pennsylvania's Head Injury Clinical Research Laboratory; it showed researchers and attendants exhibiting a very callous and cavalier attitude toward the baboons being utilized. Following a four-day PETA sit-in at the National Institutes of Health in July 1985, the US Secretary of State cut off federal funding for the laboratory (24). The publicity gained was widespread; however, doctors have deplored such disruption of research, calling it "costly in terms of time, money, and animal lives" (25). Interestingly, the title of the tape came from a *Globe and Mail* interview with researcher Dr. Thomas Gennarelli, who said he did not want to discuss his work, because it could "stir up all sorts of unnecessary fuss..."

Also interesting was the criticism of PETA's "use of half-truths, misstatements of fact, and obfuscation" by the executive director of the Pennsylvania SPCA. Erik Henricks wrote in his society's newsletter that, after viewing the University of Pennsylvania tapes, "it is clear why PETA refused to give them up for nearly a year, and did so only after being threatened by the subpoena authority of a federal agency; PETA wanted to control the news media and make hay while it could, knowing that full disclosure of the entire set of tapes would expose their (PETA's) unethical tactics in this case" (26).

In the area of use of animals in research, "these zealots have the biomedical community on the run. Funds have been redirected to security measures and the construction of new facilities has been postponed," writes author Betty Ann Kevels in the *Los Angeles Times* (July 7, 1988). "Most serious of all, good scientists are leaving research, unwilling to live behind the barricades that the threats have obliged universities to build" (27).

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However, "the greatest danger to animal research is not the activity of its opponents, but the inactivity of its defenders," Doctors Smith and Hendee contend (28). They find it difficult to understand veterinarians or doctors who support animal rights: "Those who can best appreciate the value of animal research to humans and animals should be among its staunchest defenders."

### **Militancy**

The Animal Liberation Front was founded in England in 1976, by Ronnie Lee. Nicknamed "The General" by Sheffield police, he is now serving a ten-year sentence for ALF activities primarily involving firebombing. In December (1988) the ALF mailed a firebomb to the home of Professor Ian Glynn, head of the physiology department of Cambridge University. Ironically, the professor, who escaped unhurt, works not with animals, but with cell cultures.

Also in the UK, AR activists stretched piano wire across the road to garrotte unwary fox hunters. Two others went to jail for plotting to dig up the body of the Duke of Beaufort, a hunter and friend of Queen

Elizabeth II, cut off his head and send it to Princess Anne (29).

Those connected with supplying Canadians with meat are concerned about possible future violence. As Ted Welch wrote in the *Toronto Sun* (January 25, 1987): "What starts as spray-painting a few slogans and throwing equipment around can easily escalate into something far more sinister. It's not that big a step from trashing the butcher shop to slicing the butcher." (Or by extrapolation, the veterinarian).

### **"Attempted murder" a set-up?**

November 11, 1988, Frances Stephanie Trutt was arrested in Norwalk, Connecticut while planting a powerful, radio-controlled pipe bomb near the parking spot of the chairman of US Surgical Corporation (30), which uses dogs for teaching and training in connection with its suturing device, which reportedly reduces blood loss and tissue trauma (31). Trutt's bond was set at \$500,000. January 28, members of the FBI-New York City Police Department joint terrorist taskforce also arrested two men on charges of making Trutt's bomb.

However, antivivisectionists now claim the arrest was a set-up, that Trutt had been apprehended in an ambush arranged by a paid spy employed by a pro-research consulting firm called Perceptions International (32). A group has been formed in Toronto to support Trutt.

The activists also claim that a Perceptions operative called Mary Lou Sapone infiltrated the Toronto-based Animal Liberation Front Support Group, attending its "Anarchist Survival Gathering" held in that city in July, 1988 (33).

Perceptions Press publishes a very expensive (\$195 US per year) newsletter, the *Animal Rights Reporter*. A recent article in the *Reporter* (December, 1988) notes: "Just as the shooting down of a civilian Rhodesian airliner by a local terrorist group in the 1970s created an environment in which murderous attacks like the *Achille Laro* incident could be conceived and implemented by dedicated extremists, so might Trutt's action stand as a milestone for the Animal Rights Movement" (34).

### **Animal rights raids in Canada**

The first Canadian animal rights attack occurred at the University of British Columbia in January 1981, when the office of animal care director, veterinarian Dr. John Gregg, was firebombed (35); he had earlier been threatened with knee-capping.

In 1985, a West coast animal rights/ecology organization called Lifeforce Foundation used illicit photos of a baboon being held in a restraining chair at the University of Western Ontario to raise funds to "free" the animal (36). The organization laid a private charge against UWO researchers and its director of animal care services, veterinarian Dr. Bill Rapley. However, the court transcript shows that the judge, in dismissing the case, said the charge had been "groundless and without foundation" and implied that it had been undertaken for publicity (37).

In 1986, Lifeforce tried to persuade the B.C. Attorney General's Department to lay "cruelty and

neglect" charges (regarding postoperative care of a dog) against Vancouver General Hospital researchers and its supervisor of animal laboratories, Jan van den Broek. However, the AG refused to do so (38).

April 30 and May 1, 1989, Vancouver dailies carried stories indicating that the Canadian Council on Animal Care had criticized the University of British Columbia's G.F. Strong Laboratory. Located at Vancouver General Hospital, it is due for replacement within two years. The CCAC's confidential report had been "leaked" to the newspapers.

A *Vancouver Sun* story said the report had been obtained by LifeForce, and quoted van den Broek as stating that it had been stolen from his office, adding: "We are aware of a security breach in the facility... There has been an unlawful entry." Van den Broek added that "both the (Vancouver General) Hospital and the University (of British Columbia) are committed to following that (CCAC) report to the letter" (39).

### **How AR activities boost the cost of animal use**

In addition to trying to cast doubts on the validity and humaneness of biomedical research, animal rights activists are doing their best to financially harm those who use animals (40,41).

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Even the popular move to stop testing of new commercial products and cosmetics is seen as precursor to putting an end to medical research (42).

Legislation governing procurement of dogs is in place in Ontario, Saskatchewan, and Alberta (43). In 1986, at a time it was running an annual deficit of \$400,000, the Toronto Humane Society's (THS) Coalition for Pound Seizure spent \$200,000 unsuccessfully trying to scuttle Ontario's Animals for Research Act (44), even though the THS has never been asked to turn unwanted animals over for research.

Interestingly, the same amount was spent by the California office of the US's largest proresearch organization, the Foundation for Biomedical Research (FBR), to achieve the exact opposite (45).

Veterinarian Dr. Marilyn Keaney, director of animal care services at the University of Ottawa, says that "unfortunately, because of animal rights activities, fewer random source animals are available. These unwanted animals, which would be destroyed anyway, could well make an important contribution to some medical breakthrough, and only one animal would die, rather than two."

The Toronto Humane Society supported MLA Ed Philip's Private Member's Bill to amend the (Ontario) Act so as to allow municipal pounds to refuse to give up animals for research. The Bill received second

reading, but not the necessary third. The Society also supported MLA "Bud" Wildman's Private Member's Bill 190 to reduce or stop use of animals in the Draize (eye irritancy) test, and the Lethal Dose 50 test for toxicity.

### **Livestock Management**

In the February 1989, issue of the *Canadian Veterinary Journal*, editor Grant Maxie and a number of veterinarians discussed the possible future for food animal practice (46,47). However, if the animal rights activists continue their present course, there may not be a need for such dialogues in the meatless world of the future.

In England, for example, there are nearly three million vegetarians (48), and although most of Canada's dinners begin with meat (49), the World Council of Churches, representing 400 million members, February 3, 1989, issued a press release calling for Christians not to eat "meat from animals which are raised on factory farms" (50). (It also sought to halt animal use for cosmetic testing, and use as furs).

Strongly criticized are livestock intensive management practices (LIMP) — especially crating of veal calves and battery rearing of chickens (51). In Vancouver, Peter Stratton writes, edits and publishes a newsletter called *Intensive Farming Review*, devoted almost entirely to criticism of such practices.

The *Ontario Farmer* reported that members of the Canadian Agri-Marketing Association "listened with a mixture of interest and trepidation" while Vicki Miller, founder of the hardcore animal rights organization, ARK II, and (then) president of the Toronto Humane Society, told them that eating meat wasn't healthy. They reportedly greeted her with guffaws (52).

However, more astute observers warn that the animal rights movement can only be ignored at one's peril (53). One individual who has been urging action to combat the AR lobby is Mrs. Sharon Weitzel who, with her husband, Ken, raises Holstein cattle on a small dairy farm near Tavistock, Ontario. Mrs. Weitzel speaks for both the recently-formed Ontario Farm Women's Organization, and Women for the Support of Agriculture; both groups network with American Agriwomen in the US. Mrs. Weitzel says she has been personally speaking out against the AR movement for the past four years. "We have to educate the farmer not to laugh at animal rights. We have to stress how serious the matter can become. We cannot afford to ignore it," she said in a telephone interview May 16. She urges both farmers and the veterinary profession to defend humans' use of animals and to actively oppose AR activists: "Veterinarians should have as much interest in this as farmers. Their welfare depends on our welfare."

The profession has begun to respond. For example, the *Ontario Veterinary Association Update* last year carried an article on the Ontario Farm Animal Committee, formed "in an effort to address the whole area of animal activism and the impact it could have on both farmers and consumers alike" (54).

The Humane Society of the United States (HSUS) contends that there is a strong correlation between

colon cancers and consumption of both fat and animal protein. It has dubbed bacon and eggs the "Breakfast of Cruelty" because of "the keeping of hens in battery cages and gestating sows in narrow stalls" (55). However, the HSUS also advocates the more moderate stance endorsing consumption of naturally-reared meats (these are also available in Canadian supermarkets).

It is reported that followers of Krishna in the US, believing that nonproducing cows should be retired not slaughtered, have instituted an "Adopt-A-Cow" program: "For \$3,000 an adopter can support a cow for life" (56). As well, since Farm Sanctuary developed its program in 1986, "dozens of animals have been taken out of factory farms and placed in permanent homes."

The HSUS only recently announced its development of *Guidelines for Raising Livestock, Poultry, and Dairy Animals*. However, Agriculture Canada, with the assistance of the Canadian Federation of Humane Societies, the CCAC and others has, for some time, published and distributed Codes of Practice for handling chickens (out of print), pigs, and special-fed veal calves, as well as mink and ranched fox (57).

### Proresearch activities

Canada's most firmly established proresearch organization is Canadians for Health Research (CHR) (P.O. Box 126, Westmount, Quebec H3Z 2T1). Founded in 1976, its membership comprises 64 volunteer health societies and scientific organizations (a similar organization has just been founded in the US). Headed by Patricia Guyda, CHR publishes a magazine called *Future Health*, which focusses on new research, a quarterly newsletter called *The Diary*, providing up-to-date news on animal rights activities, a manual to help researchers deal with the media, and has in the works a major contribution called *A True Story*.

More recently, a group of citizens in the Toronto area has founded Partners in Research (PIR) (PO Box 192, Stn B, London, Ontario N6A 4V6). Described as "a grass-roots, proresearch organization," one of its first moves was to hire Ron Calhoun, a retired General Motors official, as its executive director. Calhoun, who coordinated the Terry Fox Run, and coined the phrase "Marathon of Hope", says that his group already has 1,200 members. It has just published the first edition of a newsletter, and PIR chapters have been formed in the university cities of London, Toronto and Ottawa, and are planned for Kingston, Guelph and Hamilton. Calhoun says PIR's job is to "educate and re-educate" the public about the need for biomedical research, and he appears to enjoy debating "animal rights radicals."

Canada at last count had some 35 "animal protection" organizations plus the CFHS, representing 42 local humane society branches. A recent American article claims there are "7,000 animal protection groups in the US, with combined memberships of 10 million, and total budgets of some \$50 million" (58).

A number of veterinarians participated in a discussion on the ethics of animal use by experts from

Canada, the US, and Europe, July 7, 8, in Ottawa at a Bioethics '89 conference entitled "A New Deal for Animals in Research?" The conference will be sandwiched between the annual meeting of the Canadian Association for Laboratory Animal Science (July 5-7) and the CVMA convention July 9-12.

An organization called the J.F. Morgan Foundation for the Alternatives (to animal use) has also been formed, with CFHS president, Mrs. Nancy Erickson, as its chairperson. Its executive director is University of Guelph Professor Emeritus, Dr. J.P.W. Gilman.

### The role of the veterinary profession

Is there a positive side to this issue? Yes, says veterinarian Dr. Rick Latt, of McGill University: "The effect of the AR movement has been to raise the sensitivities to the issue among the biomedical community. It has also increased scrutiny of how research animals are used."

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### The effect of the AR movement has been to raise the sensitivities to the issue among the biomedical community

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A very positive move has been University of Guelph Senate approval February 21 for the formation of an Animal Welfare Study Centre at that University. The Ontario Veterinary College and the University of British Columbia would each like to be the fourth institution worldwide to establish a Chair in Animal Welfare, following The Netherlands, Cambridge University, and the University of Pennsylvania.

Veterinarian Dr. Frank Loew, easily the profession's most erudite spokesman, criticized his colleagues for not responding more positively to the need for improved animal welfare, in his brilliant Schofield Memorial Lecture delivered at the University of Guelph September 25, 1987 (59). Loew, who has served on the faculties of Johns Hopkins University and the University of Saskatchewan (Western College of Veterinary Medicine), is Dean of the Tufts University School of Veterinary Medicine, Boston, and editor of the *Institute for Laboratory Animal Resources News*.

Loew said that veterinarians who spoke out on animal issues were "often viewed with the suspicion that is usually reserved for old men who sleep on park benches." Given veterinarians' love of animals "it is therefore remarkable," he noted, "that this profession, of all professions, has been so inactive in the field of animal welfare."

Dr. Bernard Rollin, a professor of physiology and biophysics/professor of philosophy at the Colorado State University College of Veterinary Medicine, is author of *Animal Rights and Human Morality*. At its conclusion he wrote: "Veterinarians are naturally committed to animal welfare. They are trained scientists... If anyone can speak knowledgeably for the rights of pet animals, it is veterinarians. And most important, their work provides them with a natural forum for educating a significant portion of the pet-owning public" (60).



## Veterinarians as mediators

As both Loew (61) and Webster (62) point out, not only humans, but animals, benefit from research involving animals. It seems inevitable that veterinarians are going to be called upon to act as mediators when the needs of animals and humans come into conflict (63). There are two "dangerously petty" views about animals, says Dr. Calvin Schwabe of the University of California, Davis. "One view sees animals as objects to be used, and the other is to treat them as people substitutes" (64).

Writing in the AVAR newsletter, veterinarian Dr. Marilyn Christensen, noted: "Often, in the midst of controversial issues, with the animal research community on one side, and the animal rights community on the other, it is the veterinarian who is called upon to provide a definitive answer of what is 'right'; to validate one side's position or the other. After all, the veterinarian combines an emotional interest in animals and scientific expertise" (65).

Alliston Porter, Registrar of the Royal College of Veterinary Surgeons advised that the profession have "a full awareness of the veterinarian's role as the animal's friend" and attempt to provide "care, competence, confidence, courage and clout" (66).

Perhaps veterinarian Dr. Janet Remetta said it best: *"I look forward to the day when animals are no longer used for experimentation, and I will work in the interim to provide protection for those who are"* (67).

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